**MEMO ENDORSED** 

## **DICKSTEINSHAPIROLLP**

1177 Avenue of the Americas  $\mid$  New York, NY 10036-2714 Tel (212) 277-6500  $\mid$  Fax (212) 277-6501  $\mid$  dicksteinshapiro.com

Writer's Direct Dial: (212) 277-6585 Writer's Direct Fax: (917) 591-7897

E-Mail Address: SkakelD@dicksteinshapiro.com

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## Via Hand Delivery

The Honorable Peter K. Leisure U.S. District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York

Re: Comverse, Inc. v. American Telecommunication, Inc. Chile S.A., et al. Case No. 07 Civ. 11121

Dear Judge Leisure:

We represent petitioner Comverse, Inc. ("Comverse") in the above-referenced matter. We are in the process of preparing reply papers, which must be filed by April 14, 2008, in further support of Comverse's Order To Show Cause compelling respondent ATI Telecommunication, Inc. Chile S.A. ("ATI Chile") to respond in full to Information Subpoenas served upon it pursuant to Rule 69(a) of the Federal Rules of Civil Procedure (and in opposition to ATI Chile's Cross-Motion For Protective Order).

Our reply papers will discuss and/or attach certain documents and information from the record in the underlying arbitration (the "Arbitration") (the confirmed award arising out of which was the predicate for the judgments Comverse now seeks to enforce). We anticipate that ATI Chile will deem at least some of these documents and information sufficiently confidential to warrant an "Attorneys' Eyes Only" designation pursuant to the Stipulation and Protective Order dated November 10, 2006 governing the Arbitration. While we are not conceding that Comverse agrees with such designation, out of abundance of caution, we intend to file such papers under seal to enable us to provide the Court with complete and timely reply papers.

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Accordingly, we respectfully request that you so order this letter indicating that Comverse has permission to file its reply papers under seal with the Court on or before April 14, 2008.

Respectfully submitted,

Deborah A. Statel

Deborah A. Skakel

Neil E. McDonell, Esq. (via e-mail) cc: Brooke E. Pietrzak, Esq. (via e-mail)

SO ORDERED on this \_\_day of \_\_\_\_\_\_, 2008

Hon. Peter K. Leisure United States District Judge